

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: : Chapter 13

Joanne Lawrence : Case No. 20-14010-amc  
Debtor(s)

ANSWER TO MOTION OF RELIEF FROM THE AUTOMATIC STAY OF  
PNC Bank, N.A.  
AND CERTIFICATE OF SERVICE

Debtor alleges that she has not missed payments at all and disputes the allegations of the Movant.

WHEREFORE, Debtor respectfully requests this Honorable Court deny Movant's Motion for Relief from Automatic Stay.

/s/ David M. Offen  
David M. Offen Esquire  
Attorney for Debtor

Dated: April 8, 2024

A copy of this Answer is being served on DENISE ELIZABETH CARLON, Esquire and the Chapter 13 Trustee.

/s/ David M. Offen  
David M. Offen Esquire  
Attorney for Debtor

Dated: April 8, 2024